

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2020 JAN -5 PM 3:49

DEPUTY CLERK \_\_\_\_\_ **CA**

Kesha Terry

Plaintiff

**3-21 CV0016-X**

v.

Civil Action No.

Detention Workers, Supervisor at Dallas Sheriff Dept.  
Defendant + Dallas County Sheriff  
Dept.

**COMPLAINT**

U.S. Law Section 19 of Title 42  
Also under 42 U.S. Code 1983  
I Am bring forth this Civil Case based on  
Police Brutality when I was arrested and in the  
hands of officers / detention workers I was abused  
molested / stepped on / injured + lost blood  
during the changes of clothes. I was told to  
lay on my stomach, and while on my stomach  
I was stepped on, the supervisor also damaged  
damaged my arms when she with up words  
to words my back with hand cuffs on my  
wrist they did to me was not right.  
I am asking that action be taken against  
those officers.

\* Attach additional pages as needed.

Date Jan 5, 2021

Signature Kesha Terry

Print Name Kesha Terry

Address 9511 Old Town Row

City, State, Zip Dallas, TX 75227

Telephone 214-336-8230

**UNITED STATES DISTRICT COURT-GEORGE  
OF NORTHERN DISTRICT TEXAS**

**Kesha Terry**

**vs.**

**Detention Workers, Supervisor,  
& Dallas Sheriff Dept.**

**Motion For The Courts To Take  
Action/Under Section 42 U.S. Code 1983**

**I, the Plaintiff, Kesha Terry is asking that the Dallas District Court will take action, and not allow the defendants to get by with harming me, abusing me, and molesting me when on of the Detention workers stuck fingers up my but tux, and a rib concussion. My arms are not the same due to nerve damage/and pain I endured when the Supervisor took my arms with handcuffs on me, and went upward towards my neck. I also lost a lot of blood.**

**I was arrested for no reason, when I went into the Irving City Jail to pick up paper work for a Civil Case # 3:11-0660/ a case that was Appealed and remanded back in my favor due to State Laws, that applied to my Civil Case, and was looked over.**

**Appeals # 14:11112/ Remanded back from the United States Appeals Court 5<sup>th</sup> Circuit in my favor due to Tex. State Laws that were looked over.**

**I did jail time for no reason, and while I was in the hands of these workers, I should have been protected, and not harmed. The False arrest was respectfully discharged when my Attorney Gemma Moffa explained to the DA about my injuries/and I was not put on any type of probation/I was just asked to take can goods to the Dallas Texas Food Bank.**

**I am asking that this Civil case be taking serious , in what I endured being locked up in the Dallas County jail by detention workers who along with their Supervisor aided her workers to step on, molested me, abused me causing harm to my body ( Robert Davis vs. New Orleans October 9, 2005). Officers in Robert Davis case was held responsible for what they did.**

**Officers/Detention & Supervisor workers should be responsible for what they did. Excessive force was used on me for no reason, and I had a right to be protected, and I I wasn't , instead I was brutalized by these workers. I am asking that this Case be taken seriously, and based on the injuries I sustained.**

**My Case was first with another Judge in this Court who took my Civil Case Serious, that Judge retired, and after that the case was not taken seriously.**

**The Magistrate Judge who had no history of the Case, and never cared to look into the Case, have tried to throw my Civil Case out under Section 42 1983.**

**Section 42 1983 is a right a citizen got when they have been brutalized by law enforcement.**

**Because of the Color of my Skin, this case/and other cases have not been taking serious when by Law, I have a right to file my Civil Case under the law that is up for citizens/people like me regardless of my skin color/my religion/etc.**

**I am asking that Justice Prevail in this Case, and not be thrown out.**

## CIVIL COVER SHEET

Case 3:21-cv-00016-X-BH Document 3 Filed 01/05/21 Page 4 of 4 PageID 8

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS Keshu Terry(b) County of Residence of First Listed Plaintiff Dallas  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS Detention workers / Supervisor at the Sheriff Dept  
Also at the Sheriff DeptCounty of Residence of First Listed Defendant Dallas

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

JAN - 5 2021

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (For Diversity Cases Only)

- |   | PTF                                 | DEF                                 |   | PTF                        | DEF                        |
|---|-------------------------------------|-------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2          | <input type="checkbox"/> 2          | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3          | <input type="checkbox"/> 3          | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veterans' Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input checked="" type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. Code 1983 Civil Action of deprivation of rights  
 Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMANDS 4 million  
422,000,000

CHECK YES only if demanded in complaint:  
 JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See Instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE